

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

JAVIER CAZARES, Individually as Wrongful	§	
Death Beneficiary of J.J.C., Deceased Minor, et	§	
al.,	§	
	§	
Plaintiffs,	§	
v.	§	No. 2:24-cv-00045-AM
	§	
JUAN MALDONADO, et al.,	§	
	§	
Defendants.	§	
	§	
	§	

**DEFENDANT MOTOROLA SOLUTIONS, INC.’S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF’S AMENDED COMPLAINT**

Defendant Motorola Solutions, Inc. (“Motorola”), hereby moves the Court for an extension of time to respond to Plaintiff’s Complaint and respectfully shows the Court as follows:

1. Plaintiff’s Complaint was filed on May 22, 2024.
2. Plaintiff’s Amended Complaint was filed on May 24, 2024.
3. Motorola was served with the Complaint on May 30, 2024.
4. Motorola’s responsive pleading is currently due June 20, 2024.
5. Motorola is in the process of gathering information necessary to respond to the factual allegations in the Complaint.
6. Motorola’s counsel has conferred with Plaintiff’s counsel and they do not oppose this request.
7. This is Motorola’s first request for an extension of time. The request extension will not prejudice the parties.

8. For the above reasons, Motorola requests that the Court issue an order extending the time within which it must answer or otherwise respond to Plaintiff's Complaint to July 22, 2024.

Dated: June 20, 2024

Respectfully submitted,

/s/ Pete D. Laun

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ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF CONFERENCE

I hereby certify that on June 19, 2024, Motorola's counsel conferred with Plaintiff's counsel via e-mail regarding the relief requested and they are unopposed to the request.

/s/ Pete D. Laun
Pete D. Laun

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2024, I caused the foregoing to be electronically filed with the Clerk of Court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Pete D. Laun
Pete D. Laun